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February 6, 2017

VIA ECF

Honorable Alison J. Nathan
United States District Court
Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *United States v. Trevon Gross*, 15-cr-769 (AJN)

Dear Judge Nathan:

We write to request that Exhibits A, B, E, F and J to our letter at Docket No. 378, which contain witnesses statements, be filed under seal. While we understand that there is a presumption of public access to the exhibits, *see Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 127 (2d Cir. 2006), these witness statements contain some personal information, including addresses and phone numbers, and the witness statements produced by the government were also produced pursuant to a protective order. The exhibits also contain grand jury materials and testimony. Accordingly, we write seeking permission to file these exhibits under seal. We anticipate making further motions *in limine* containing witness statements, so if the Court has guidance on how we should proceed with providing these exhibits for the Court's consideration while also safeguarding the personal information of witnesses, including cooperators, who have yet to testify and may never testify, we are happy to comply with whatever procedures the Court deems appropriate.

Thank you for your attention to this matter.

Respectfully submitted,

s/ Kristen M. Santillo
KRISTEN M. SANTILLO